REMARKS

As a preliminary matter, it is noted that the Examiner did not initial JP 2004-13227 cited in the Information Disclosure Statement filed on April 1, 2004. An updated copy of the IDS and an English translation of the Abstract for JP 2004-13227 is attached hereto for the Examiner's reference. It is respectfully requested that the Examiner provide Applicants an initialed copy of the IDS indicating that each of the prior art references cited therein have been considered and made of record.

Claims 6 and 7 stand rejected under 35 U.S.C. § 112, second paragraph. Regarding claim 6, the simulation can be precise at clock level, that is, the result of the simulation can be observable at each rising clock edge as shown in one exemplary form in Fig. 6 of Applicants' drawings. It is respectfully submitted that the enclosed amendment obviates the alleged indefiniteness. Accordingly, it is respectfully requested that this rejection be withdrawn.

Claims 1-8 stand rejected under 35 U.S.C. § 102 as being anticipated by Ghosh et al. ("Ghosh"). Claim 1 is independent. This rejection is respectfully traversed for the following reasons.

Claim 1 recites in pertinent part, "a ***plurality*** of simulator models ***each*** including a functional model for a CPU constituting a system to be simulated ...; plural ***types*** of interfaces included in the simulator models and enabling plural types of simulators for various uses to access to the functional models ..." (emphasis added). According to one exemplary aspect of the present invention, a multibus master system can be comprised of a plurality of masters in which the master can be, for example, a CPU. In contrast, Ghosh discloses a system including ***only one***

bus master in which a bus-functional model is implemented only in software (*see* section 3.1). Accordingly, it is impossible to simulate a multibus master system with such an implementation.

Moreover, Ghosh does not disclose or suggest "plural ***types*** of interfaces included in the simulator models and enabling plural types of simulators for ***various uses*** ... ." In direct contrast, Ghosh expressly discloses that "the interfaces methods have the same prototype for all BFMs" (*see* section 3.1.1, second paragraph, lines 1-3).

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed, either expressly or inherently (noting that "inherency may not be established by probabilities or possibilities", *Scaltech Inc. v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999)), in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that Ghosh does not anticipate claim 1, nor any claim dependent thereon.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as claim 1 is patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable. In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. § 102 be withdrawn.

CONCLUSION

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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